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TAKING **INGENUITY** TO NEW HEIGHTS

November 13, 2009

Via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Reply Comments – NBP Public Notice # 6
Spectrum for Broadband
GN Docket Nos. 09-47, 09-51, 09-137, 09-157

Dear Ms. Dortch:

Along with several major electric utilities, Space Data Corporation ("Space Data") filed comments related to the implementation of smart grid technology in response to the Commission's NBP Public Notice # 2.[1] Space Data as well as two other commenters in the above-referenced dockets, American Messaging Services, LLC and Sensus USA, Inc. ("Sensus"), are major holders and operating entities in the Narrowband Personal Communications Service ("NPCS") band (see Exhibit 1 – NPCS Licensed Spectrum). By this letter, Space Data replies to comments about the availability of spectrum that can support smart grid and other critical infrastructure industries ("CII").

The Utilities Telecom Council ("UTC") and Critical Infrastructure Communications Coalition ("CICC") argue that current spectrum allocations do not provide sufficient amounts of spectrum to support smart grid and other next-generation CII systems and urge the Commission to allocate at least an additional 30 MHz of spectrum for CII use.[2] The CICC, relying on a spectrum assessment conducted by UTC, noted that "existing spectrum bands are all narrowband and subject to interference and congestion. Moreover, smart grid and other next-generation CII communications systems will impose additional demands for broadband spectrum, which currently is unavailable below 1 GHz."[3]

UTC's spectrum assessment, however, did not include the NPCS band in its review of current spectrum allocations below 1 GHz. As Space Data and others have previously commented in this proceeding, NPCS spectrum is ideal for providing smart grid and other CII applications.[4] For example, Sensus, which uses NPCS spectrum to provide smart metering and smart grid services, recently identified multiple large and small electric utility customers that utilize Sensus' services and noted that it is involved "in 180 projects in the US to provide smart meter communication systems for gas and water distribution utilities."[5]

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[1] *See* Letter from J. Wiesenberg, Space Data, to Marlene Dortch, FCC, GN Docket Nos. 09-47, 09-51, 09-137 and 09-157 (Oct. 2, 2009) ("Space Data Smart Grid Letter").

[2] *See* Comments of the Utilities Telecom Council, GN Docket Nos. 09-47, 09-51, and 09-137 (Oct. 23, 2009); Comments of the Critical Infrastructure Communications Coalition, GN Docket Nos. 09-47, 09-51, and 09-137 (Oct. 23, 2009) ("CICC Comments").

[3] CICC Comments at 4.

[4] *See, e.g.,* Space Data Smart Grid Letter.

[5] *See* Comments of Sensus USA, Inc., GN Docket Nos. 09-47, 09-51, and 09-137 (Oct. 2, 2009).

Innovative companies can provide leading edge smart grid communications using NPCS spectrum. For example, Space Data has four large blocks of contiguous NPCS channels from 300-450 KHz on a nationwide basis and another near nationwide 100 KHz pair for SMR service for mission critical industries and/or iDEN for enterprise customers. Although Space Data's NPCS spectrum has nationwide coverage, FCC rules allow it to partition and/or disaggregate the spectrum to fit the needs of any utility or other service area. Several types of time division duplex ("TDD") radios, including those that provide fixed and mobile WiMax services as well as more traditional services, are available that can operate in the NPCS band. Equipment companies also continue to make great strides in developing new, more efficient radios, which spectrum users will be able to employ for smart grid and other CII uses.

Space Data joined the UTC earlier this year and is actively talking to its utility members and others about how NPCS spectrum can be maximized for smart grid and CII communications. NPCS spectrum, importantly, is available now for smart grid and CII communications. Utilities can take advantage of immediately available resources instead of waiting for new spectrum to be allocated, cleared, and licensed, which would likely take years.

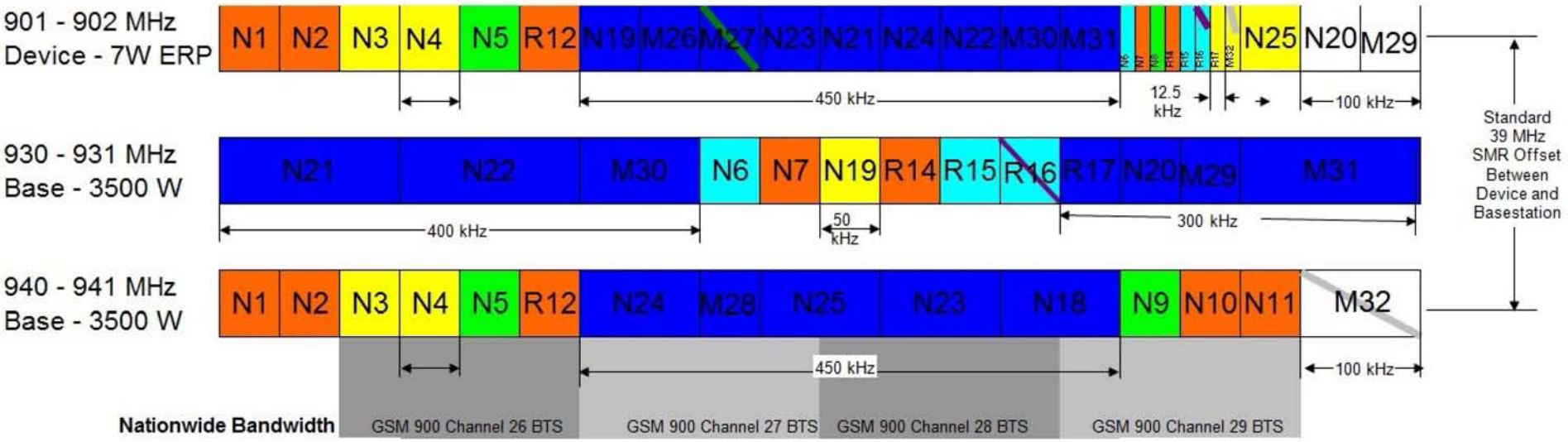
Sincerely,

/s/ Jim Wiesenberg

Jim Wiesenberg
Chief Strategy Office
Space Data Corporation
480.722.2104 direct
602.690.4929 mobile
jim.wiesenberg@spacedata.net

cc: Blair Levin
Nick Sinai
Charles Worthington

NPCS Licensed Spectrum



525	kHz	USA Mobility
325	kHz	Sensus
162.5	kHz	SkyTel Spectrum (channel 5 managed by American Messaging)
1600	kHz	**Space Data**
187.5	kHz	American Messaging
200	kHz	**Space Data Radio JV**
		Paging Systems Inc (MTA 2 Los Angeles only)
		Comsoft (NE REAG only)
		FCC (SE REAG only)

Legend

AXX = License Geographic Type A / Channel Number XX

N = Nationwide License

R = Regional Licenses

M = MTA Licenses

- Licensee of majority of markets is solid color
- Regional licensees color coded by slash mark